

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff,

vs.

ANTHONY VÁZQUEZ-ARROYO,
Defendant.

CRIMINAL NUMBER: 17-085 (DRD)

**MOTION TO CONSOLIDATE WITH
REVOCATION PROCEEDINGS IN 11-325 (FAB)**

TO THE HONORABLE DANIEL R. DOMÍNGUEZ
UNITED STATES DISTRICT COURT JUDGE
FOR THE DISTRICT OF PUERTO RICO

The defendant, Anthony Vázquez-Arroyo (“Mr. Vázquez”), by and through the undersigned counsel, respectfully states and requests as follows:

1. Mr. Vázquez is serving a term of supervised release of five years in Criminal Case No. 11-325 (FAB). On February 13, 2017, United States Probation Officer Shakira Botello (“USPO Botello”) filed a motion requesting a show cause hearing and that an arrest warrant be issued as to Mr. Vázquez. *See* Crim. Case No. 11-325 (FAB) D.E. # 51. USPO Botello alleges that Mr. Vázquez violated the conditions of his supervised release term by incurring in new criminal conduct, Criminal Case 17-085 (DRD), which is currently pending before this Court. D.E. # 9. A status conference is set in this criminal case, 17-085 (DRD), for May 15, 2017. D.E. # 23.

2. On March 21, 2017, Mr. Vázquez waived his right to the preliminary revocation hearing before Magistrate Judge Bruce McGiverin in criminal case No. 11-325 (FAB). *See* 11-325 (FAB) D.E. # 62. On April 3, 2017, Mr. Vázquez pleaded guilty in

the new criminal case 17-085 (DRD) before Magistrate Judge Marcos López. *See* Crim. Case No. 17-085 (DRD) D.E. # 27.

3. The parties discussed the possibility of consolidating both the revocation case and the new criminal case. AUSA David Henek expressed having no objection to the consolidation of the present revocation into the case pending before this Court, subject to the consent of both courts. Judge Besosa verbally expressed having no objection to the same, subject to the parties obtaining the consent of this Honorable Court.

4. Therefore, in consideration of judicial economy and to preserve Mr. Vázquez' Fifth Amendment rights not to incriminate himself, we request the consolidation of both cases into 17-085 (DRD).

5. Further, we inform the Court that Mr. Vázquez' counsel in 11-325 (FAB), Attorney Jessica Earl of the Federal Public Defender's Office, filed a motion in said case requesting that both cases be consolidated.

WHEREFORE, it is respectfully requested that the Court note the present information, and in consequence, consolidate Mr. Vázquez' revocation proceedings in 11-325 (FAB) with the present criminal case, into 17-085 (DRD).

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 4th day of April, 2017.

/s/ JOSÉ R AGUAYO CAUSSADE
JOSE R. AGUAYO CAUSSADE, Esq.
USDC-PR No. 123301
569 Teniente Cesar González St.
San Juan, PR 00918
Tel.: (787) 765-0814
Fax: (787) 274-0071
E-mail: joseraguayo@gmail.com

I HEREBY CERTIFY that on this date I electronically filed the present notice with the Clerk of Court using the CM/ECF system which will send notification of such filing to the parties of record.

/s/ JOSÉ R AGUAYO CAUSSADE

JOSE R. AGUAYO CAUSSADE, Esq.

USDC-PR No. 123301

569 Teniente Cesar González St.

San Juan, PR 00918

Tel.: (787) 765-0814

Fax: (787) 274-0071

E-mail: joseraguayo@gmail.com